

EXHIBIT B

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

NATIONAL COALITION ON
BLACK CIVIC PARTICIPATION,
MARY WINTER, GENE
STEINBERG, NANCY HART,
SARAH WOLFF, KAREN SLAVEN,
KATE KENNEDY, EDA DANIEL,
and ANDREA SFERES,

Plaintiffs,

-and-

People of the STATE OF NEW
YORK, by its attorney general,
LETITIA JAMES, ATTORNEY
GENERAL OF THE STATE OF
NEW YORK

Plaintiff-Intervenor,

v.

JACOB WOHL, JACK BURKMAN,
J.M. BURKMAN & ASSOCIATES,
LLC, PROJECT 1599, MESSAGE
COMMUNICATIONS, INC., and
ROBERT MAHANIAN

Defendant.

CIVIL ACTION NO. 1:20-CV-08668

[PROPOSED] ORDER

This matter came before the Court upon the New York State Attorney General's Motion to Intervene with a Proposed Complaint for Declaratory and Injunctive Relief. Upon consideration of all matters presented to the Court, **IT IS HEREBY ORDERED** that:

The New York State Attorney General's Motion to Intervene is **GRANTED**, and the NYAG shall file and serve its Complaint in Intervention as expeditiously as possible. Defendants shall

respond to the pleadings on or before or within 21 days after being served with the Complaint in Intervention, whichever is later.

IT IS SO ORDERED.

Dated this ____ day of _____, 2021

The Honorable Victor Marrero
United States District Judge